

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re: ) Chapter 11  
 )  
W. R. GRACE & CO., et al.,<sup>1</sup> ) Case No. 01-1139 (JKF)  
 ) (Jointly Administered)  
Debtors. )  
**Related Docket No. 14682**

**CERTIFICATION OF COUNSEL AND CERTIFICATION OF  
NO OBJECTION REGARDING DEBTORS' OBJECTION  
TO THE ROYALTY CLAIM OF CIRCLE BAR RANCH, INC.**

1. On February 26, 2007, the above-captioned debtors and debtors in possession (the "Debtors") filed the *Debtors' Objection to the Royalty Claim of Circle Bar Ranch, Inc.* [Docket No. 14682] (the "Objection"). A copy of the Objection (with exhibits) was served on: (i) the Office of the United States Trustee for the District of Delaware; and (ii) Circle Bar Ranch, Inc. A copy of the Objection (without exhibits) was served on: (i) counsel for each of the official committees appointed by the United States Trustee; (ii) counsel for the Future Claimants' Representative; (iii) counsel for the debtor in possession lender; and (iv) all parties

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<sup>1</sup> The Debtors consist of the following 62 entities: W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.), W. R. Grace & Co.-Conn., A-1 Bit & Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Inc., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgrace, Inc., Coalgrace II, Inc., Creative Food 'N Fun Company, Darex Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Ecarg, Inc., Five Alewife Boston Ltd., G C Limited Partners I, Inc. (f/k/a Grace Cocoa Limited Partners I, Inc.), G C Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc., GPC Thomasville Corp., Gloucester New Communities Company, Inc., Grace A-B Inc., Grace A-B II Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe, Inc., Grace H-G Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tarpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W. R. Grace Capital Corporation, W. R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Homco International, Inc., Kootenai Development Company, L B Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holding, Inc., Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Inc., MRA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedco, Inc. (f/k/a Nestor-BNA, Inc.), MRA Staffing Systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc., E&C Liquidating Corp., Emerson & Cuming, Inc.), Southern Oil, Resin & Fiberglass, Inc., Water Street Corporation, Axial Basin Ranch Company, CC Partners (f/k/a Cross Country Staffing), Hayden-Gulch West Coal Company, H-G Coal Company.

requesting notice pursuant to Federal Rule of Bankruptcy Procedure 2002, (exhibits were made available upon request).

2. Objections or responses to the Objection were due to be filed and served no later than March 16, 2007 at 4:00 p.m. prevailing Eastern Time (the "Response Deadline"). As of the date hereof, no objections or responses have been filed.

3. On March 19, 2007, subsequent to the Response Deadline, Circle Bar Ranch, Inc. ("Claimant") contacted Debtors' co-counsel, James E. O'Neill of Pachulski Stang Ziehl Young Jones & Weintraub LLP.

4. On March 20, 2007, Claimant spoke with Debtors' co-counsel, Lori Sinanyan of Kirkland & Ellis LLP and requested a continuance or extension of time. During this conversation, Claimant acknowledged the Objection was postmarked on February 26, 2007.

5. The Claimant indicated that he had only recently received the Objection and requested additional time to file a response to the Objection.

6. On March 22, 2007 Ms. Sinanyan contacted the Claimant to let him know that Grace would not consent to an extension or continuance, that he could file a response but that Grace would object to the late filing of such a response and that Grace intended to go forward with the Objection on April 2, 2007. Ms. Sinanyan also emailed the telephonic appearance instructions to the Claimant.

7. To date, Claimant has not filed any response or objection on this matter.

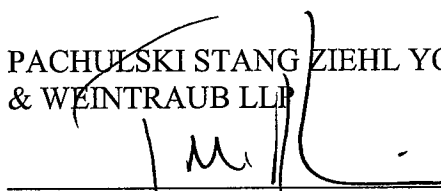
8. Counsel certifies that all of the requirements under Rule 2002-1(e) of the Local Rules of the United States Bankruptcy Court for the District of Delaware have been met and respectfully requests that the Court enter the order attached to the Objection without further notice or hearing. A copy of the order is attached hereto as Exhibit A for the Court's convenience.

Dated: March 30<sup>th</sup>, 2007

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